

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**CONSUMER FINANCIAL PROTECTION  
BUREAU,**

**Plaintiff,**

**v.**

**TOWNSTONE FINANCIAL, INC., et al.,  
Defendants.**

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**Civil Action No. 1:20-cv-04176**

Judge Franklin U. Valderrama

Magistrate Judge Gabriel A. Fuentes

**MOTION TO COMPEL**

Defendants Townstone Financial Inc. and Barry Sturner respectfully move that this Court, under Fed. R. Civ. P. 34 and 37, compel Plaintiff Consumer Financial Protection Bureau to provide full discovery responses to their Document Requests. Townstone seeks documents in CFPB's possession concerning Townstone's political and social viewpoints, as well as those of Chicago AM radio stations. *See* Defendants' Request for Document Production Nos. 34–38; 41–42. These are relevant and proportional to the needs of the case, are nonprivileged, and they would not impose an undue burden on the CFPB.

The parties have discussed their respective discovery disputes on multiple occasions, including the specific Document Requests sought in this motion on August 17 at 9:00 a.m., October 21 at 3:30 p.m., and November 2, 2022 at 12:00 p.m., when the parties met and conferred via video conference to discuss outstanding discovery issues. Attending on behalf of Plaintiff were Jacob Schunk and Gregory Jones. On behalf of Defendants were Steven Simpson, Oliver Dunford, Jessica Thompson, and John Kerkhoff. Defendants also discussed their

discovery position via letters on August 23, 2022, October 3, 2022, and November 3, 2022. After a good-faith effort, the parties agreed that they had reached an impasse as to RFPs 34–38 and 41–42, necessitating this Motion. Plaintiff opposes the Motion. As part of the meet and confers, the parties agreed to simultaneously file motions to compel and to submit, to Judge Fuentes’ chambers, a proposed scheduling order for response and reply briefs.

Dated: November 14, 2022.

Respectfully submitted,

/s/ Steven M. Simpson  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certify that on November 14, 2022, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will cause a copy to be served upon counsel of record.

/s/ Steven M. Simpson  
STEVEN M. SIMPSON